

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 3:20-cr-30100-SMY
	)	
PHILIP REIS,	)	
	)	
Defendant.	)	

**MOTION TO CONTINUE TRIAL SETTING**

COMES NOW Defendant, Philip Reis, by and through counsel, and moves this Court to continue the final pretrial conference and trial set for September 29, 2020 and October 13, 2020, respectively, by a period of 90 days. In support of this motion, Defendant states as follows:

1. Defendant is charged with a single count of Attempted Enticement of a Minor.
2. Counsel has received partial discovery but awaits additional forensic material.
3. Counsel must then meet with Defendant to review the material along with Defendant's options.
4. Additional time is thus necessary to provide "the reasonable time necessary for effective preparation, taking into account the exercise of due diligence." 18 U.S.C. § 3161(h)(7)(B)(iv).
5. Defendant, through counsel, has discussed this matter with assistant United States attorney Alexandria Burns. Ms. Burns does not object to Defendant's request.

WHEREFORE, Defendant respectfully requests this Court continue the final pretrial conference and trial set for September 29, 2020 and October 13, 2020, respectively, by a period of 90 days.

Respectfully submitted,

By: /s/ Marc Johnson  
Marc Johnson  
Attorney for Defendant  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 28, 2020, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Alexandria Burns, assistant United States attorney.